

R01-20-A-023

IV. D. Narrative Information Sheet

1. <u>Applicant Identification</u>: Pioneer Valley Planning Commission

60 Congress Street, First Floor

Springfield, MA 01104

2. Funding Requested:

- a. Assessment Grant Type: Community-wide
- b. Federal Funds Requested:
 - i. \$300,000 (\$225,000 hazardous materials, \$75,000
 - ii. We are not requesting a site-specific waiver
 - c. Contamination: Hazardous Substances (\$225,000 and Petroleum (\$75,000)
- 3. <u>Location</u>: Forty-three municipalities in Hampden and Hampshire counties, Massachusetts:

Agawam, Amherst, Belchertown, Blandford, Brimfield, Chester, Chesterfield, Chicopee, Cummington, East Longmeadow, Easthampton, Goshen, Granby, Granville, Hadley, Hampden, Hatfield, Holland, Holyoke, Huntington, Longmeadow, Ludlow, Middlefield, Monson, Montgomery, Northampton, Palmer, Pelham, Plainfield, Russell, South Hadley, Southampton, Southwick, Springfield, Tolland, Wales, Ware, West Springfield, Westfield, Westhampton, Wilbraham, Williamsburg, and Worthington.

- 4. Property Information for Site-Specific Applications: NA
- 5. Contacts:

Project Director – Ted Harvey, Senior Planner/Manager, 60 Congress St., Springfield, MA 01104. Phone: 413 781-6045 Fax: 413 732-2995 Email: tharvey@pvpc.org

Chief Executive – Kimberly Robinson, Executive Director, 60 Congress St., Springfield, MA 01104. Phone: 413 781-6045 Fax: 413 732-2995 Email: krobinson@pvpc.org

- 6. <u>Population</u>: PVPC region 621,570 at 2010 US Census; 20 Areas of Brownfields Interest as discussed in the narrative proposal, 247,841 at 2010 US Census
- 7. Other Factors Checklist: See attached.
- 8. <u>Letter from the State or Tribal Environmental Authority</u>: See attached.



Commonwealth of Massachusetts Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

One Winter Street Boston, MA 02108 • 617-292-5500

Charles D. Baker Governor Kathleen A. Theoharides Secretary

Karyn E. Polito Lieutenant Governor Martin Suuberg Commissioner

November 15, 2019

U.S. EPA New England Attn: Frank Gardner 5 Post Office Square, Suite 100 Boston, MA 02109-3912

RE: STATE LETTER OF ACKNOWLEDGMENT

Pioneer Valley Planning Commission, Application for EPA Assessment Grant Funds

Dear Mr. Gardner:

I am writing to support the proposal submitted by the Pioneer Valley Planning Commission (PVPC) under the Fiscal Year 2020 U.S. Environmental Protection Agency (EPA) Brownfield Community-Wide Assessment Grant Program. PVPC is seeking funding to evaluate areas they have designated as "Areas of Brownfields Interest" (ABI) under a Housing and Urban Development (HUD) Sustainable Communities-funded Regional Brownfield Plan. These areas contain former industrial and commercial districts ranging from mill villages to urban downtown areas. EPA funding will further PVPC's primary goal for economic development of these Brownfields sites.

In Massachusetts, state and federal agencies have developed strong partnerships and work together to ensure that parties undertaking Brownfield projects have access to available incentives. The Massachusetts Department of Environmental Protection (MassDEP), through our regional officers, provides technical support to Brownfield project proponents when regulatory issues arise. If this proposal is selected, MassDEP will work with our state and federal partners to provide the support to the PVPC that will be needed to help make this project a success.

We greatly appreciate EPA's continued support of Brownfield efforts here in Massachusetts.

Sincerely,

Paul Locke

Assistant Commissioner, Bureau of Waste Site Cleanup

ec: Kimberly Robinson, Executive Director, PVPC

Christopher Dunphy, Principal Planner Manager, PVPC

Caprice Shaw, Brownfields Coordinator, MassDEP Western Regional Office

This information is available in alternate format. Contact Michelle Waters-Ekanem, Director of Diversity/Civil Rights at 617-292-5751.

TTY# MassRelay Service 1-800-439-2370



The Pioneer Valley Planning Commission is defined as a "public body corporate" and a political subdivision of the Commonwealth of Massachusetts under section 3 of Chapter 40B of the General Laws.

The Pioneer Valley Planning Commission held its first organization meeting in April of 1962. Six communities participated in the cooperative. Today, the 43 cities and towns of Hampshire and Hampden Counties are members of the Commission. The Commission is one of 13 similar organizations in Massachusetts and approximately 650 nationwide.

The Commission is exempt from Federal Income Tax under Section 115 of the Internal Revenue Code and not as an organization described in Regulation Section 501 (c) (3).

Kimberly W. Robinson, MUP

Executive Director

Pioneer Valley Planning Commission

12·2·19

Date

Since 1962, the Pioneer Valley Planning Commission has been the designated regional planning body for the Pioneer Valley region, which encompasses 43 cities and towns in Hampden and Hampshire county areas. PVPC is the primary agency responsible for increasing communication, cooperation, and coordination among all levels of government as well as the private business and civic sections in order to benefit the Pioneer Valley region and to improve its residents' quality of life.

Although PVPC is a public sector agency, it is not a direct arm of the federal or state governments. Rather, it is a consortium of local governments that have banded together under the provisions of state law to address problems and opportunities that are regional in scope. As a result, PVPC's planning area is designated as a special district under the provisions of state enabling legislation.

PVPC is funded through modest annual assessments from its member communities, state and federal grant programs, fees for administering community development block grants, and matching funds. A transportation section also exists to carry out the mission of the Pioneer Valley Metropolitan Planning Organization (MPO) with planning funds provided by the U.S. Department of Transportation and the Massachusetts Department of Transportation.

ATTACHMENT X Appendix 3 Other Factors Checklist

Name of Applicant: Pioneer Valley Planning Commission, Mass.

Please identify (with an X) which, if any of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

Other Factor

X Community population is 10,000 or less

Applicant is or will assist a Tribe or territory

Targeted brownfield sites are impacted by mine-scarred land

X Priority site is adjacent to a body of water

Priority site(s) is in a federally designated flood plain

The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or will incorporate energy efficiency measures.

30% or more of the overall project budget will be spent on eligible reuse planning activities for priority brownfield site(s) within the target area.

See following pages for supporting attachments

NARRATIVE PROPOSAL/RANKING CRITERIA

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1a. Target Area and Brownfields

1ai. Background and Description of Target Area

The Pioneer Valley of western Massachusetts is one of America's oldest industrial regions. Bisected by the Connecticut River and crisscrossed by its tributaries, the Valley provided ideal conditions for 19th century mills that utilized water for power, transportation, and waste disposal. Factories supplanted former farm villages, creating new mill towns and urban neighborhoods. Outside of Springfield, the region's largest city, these were often true company towns, like the Town of Ware. As late as 1960, employment in the Valley's 43 cities and towns was concentrated strongly in manufacturing, with nearly 39% of workers in that sector. The area's median family income was more than 10% higher than the national average. Competition from other US regions and overseas combined with technological changes to reduce the area's competitive advantage for industry. The '70s and '80s saw more than 45% of all Springfield manufacturers close. Industrial jobs fell to 10.1%, replaced largely by lower-paying service jobs. Median income dropped below the national level and far below the statewide mark in the same timeframe. [1960 and 2010 Census; 2009 Federal Reserve Bank of Boston; 2017 5-year ACS].

Since the formation of the Pioneer Valley Planning Commission (PVPC) in 1962, the agency has been at the forefront in identifying regional challenges and categorizing regional progress. In 2013, the Pioneer Valley Planning Commission (PVPC) completed a Regional Brownfield Plan as part of our larger HUD-funded Sustainable Communities planning process in partnership with the Capitol Region Council of Governments in nearby Hartford, Connecticut. The Brownfields Plan has guided past Brownfield Grant applications through identification of 20 'Areas of Brownfields Interest' (ABIs) within the PVPC region, each delineated by clustered Census block groups or a Census-designated place. Past Brownfields assessment funding was used to target these areas, but significant work remains. If funded, PVPC intends to conduct an assessment program that continues to focus predominantly on these neighborhood-scale areas, where brownfields are pervasive, but resources to address them are lacking.

1aii. Description of the Priority Brownfield Site(s)

To illustrate the range of challenges faced by these communities, this proposal will focus on two priority sites located within two municipalities in the Pioneer Valley. The Town of Ware is located at the eastern most end of the region with a population of 9,800. Ware is a former manufacturing town with outlying farms that has partly suburbanized in the recent decades. While the Town has taken a number of steps to encourage redevelopment, including designating a downtown Slum & Blight area and an Opportunity Zone, the Town has a long way to go. One priority site is the Ware Millyard, located in downtown, along the banks of the Ware River. The Millyard is one of 54 21e sites in Ware. The redevelopment of the Millyard is vital for the Town's continued development. While Ware represents the smaller to mid-sized communities in the Pioneer Valley, the City of Springfield represents the larger urban areas (Chicopee, Westfield, Holyoke, etc.) Springfield is the urban hub of the Pioneer Valley and the largest city in western Massachusetts. Five areas in Springfield have been recognized as ABIs' in PVPC's regional brownfield plan. 135-155 Lyman Street has been identified as a priority assessment and cleanup site in the City, a priority site in the Regional Brownfields Plan, and part of one of Springfield's 7 Opportunity Zones. The site includes a warehouse and underground storage tanks. Phase II and Reuse Planning are required for this site. The City is looking at a reuse plan that includes mixed-use live/work spaces.

1b. Revitalization of the Target Area

1bi. Reuse Strategy and Alignment with Revitalization Plans

As a regional planning agency, PVPC strongly believes that resources should be allocated based on strategic planning. The Regional Brownfields Plan identifies neighborhood-scale areas within the region where brownfields assistance resources are needed most, and provides neighborhoodwide and site-specific strategies for fostering revitalization of brownfields within these areas. The 20 ABIs that were identified are former industrial and commercial districts, and include mill villages and large urban districts. All lack the resources needed to revitalize brownfield sites. Brownfields cleanup will continue the Pioneer Valley's work towards achieving regional sustainability, resilience and economic vitality. More specifically, brownfield assessments and cleanup correspond directly with local redevelopment and revitalization plans within local communities in the Pioneer Valley. For example, cleanup and redevelopment of Ware's Millyard has been identified as a priority in the Town's Master Plan and the 2001 Millyard Economic Development Plan. The Millyard is also located in Ware's Opportunity Zone. In Springfield, 135-155 Lyman Street has been identified by the City of Springfield as a priority redevelopment site. It is located in the downtown area near the recently refurbished Union Station, Springfield's train station, and the bus terminal. The site is located in one of Springfield's 5 ABIs and is located in one of the City's 7 Opportunity Zones. The City is committed to assessment, cleanup and redevelopment of the site.

1bii. Outcomes and Benefits of Reuse Strategy

Given our knowledge of the ABI neighborhoods, known sites, and municipal priorities, we expect the assessment and ultimate re-use of brownfields to result in both economic and non-economic outcomes and benefits. Assessment activities will open the door for our communities to redevelop their most-challenged sites and neighborhoods, bringing broad economic benefits to areas that haven't seen many in recent decades, and aiding in the long-term transition to a more balanced economy. Many of these sites exist in Opportunity Zones. The Pioneer Valley region has 21 designated Opportunity Zones including one in downtown Ware and 7 in Springfield.

Job creation is an anticipated outcome of this program. Experience shows that even small redevelopments have employment benefits. Several of the potential assessment sites for this grant, including the Millyard in Ware, are expected to be significant job creators. With job creation come tax benefits for local governments. The region's brownfields-impacted communities have very limited resources for raising revenue through taxation. By converting brownfields into businesses or housing, this grant will help cities and towns pay for essential services. Substantial improvements in public health and livability should coincide with this kind of long-term economic growth.

PVPC's proposed site selection criteria will emphasize projects where post-redevelopment economic benefits extend to many constituencies in the 20 ABIs. For the business community, parcels will be made ready for business and housing. For cities and towns that contain ABIs, sites for business attraction, expansion and retention efforts will be made more attractive via reduced uncertainty. Local tax bases will grow through increased land values as sites are cleaned and revitalized. The reduced perception of contamination and neighborhood blight will indirectly raise values at nearby properties, creating opportunities for echo development. Pressure on municipal tax rates will be reduced as now-unproductive properties move back onto the tax rolls, eventually creating a positive feedback loop for business. For residents in ABI neighborhoods,

new job opportunities will be created. By emphasizing affordable housing in our site selection, ABI residents will benefit financially from affordable housing for low-income families.

Non-economic community benefits will be promoted through the site selection criteria, which include quality-of-life topics like greenspace creation and community amenities. Greenspace reuses may be part of a commercial project or a dedicated recreational space. Since defunct mills are often sited along rivers like the Ware River, water quality may benefit and recreational access may improve through revitalization of riverfront sites. Since brownfields are typically located in town or neighborhood centers, their cleanup can provide municipalities with new opportunities to reactivate these critical community spaces through implementation of local master plans and open space plans, which in ABI-containing communities are very often complicated by blighted properties. Municipal town center projects typically include parks or new municipal facilities.

1c. Strategy for Leveraging Resources

1ci. Resources Needed for Site Reuse

PVPC has leveraged at least \$15 million in ACRES-reported resources through assessments and cleanups in past brownfield projects: \$7m in Ware (Farm Equipment site), \$5m in Chester (Wood Waste site - this one predates ACRES), and \$3m in Springfield (\$2m at the Asylum site, \$1.1m expected at the ongoing Gunn Block cleanup). Examples of additional leveraging include approximately \$50,000 in HUD HR program income funds available for cleanup (if required) in Ware and future CDBG funds will be sought as necessary following assessment/cleanup. Springfield is a CDBG Entitlement Community, receiving almost \$4 million in FY19. The City also has a robust Brownfields Redevelopment Program that is committed to funding future Brownfields cleanup.

Other resources may include potential further brownfields funding from the EPA and HUD Community Development Block Grants (CDBG) for entitlement communities (or competitively through the state for our smaller towns). At the state level, there are a variety of incentive programs available for brownfields. MassDevelopment's brownfields redevelopment fund, which offers loans for assessment (\$100,000) and cleanup (\$500,000), can offer grants for key economic development projects. The state also offers incentives for private and non-profit development through subsidized environmental insurance, a transferable tax break on cleanup costs, and a Covenant Not to Sue liability relief program.

1cii. Use of Existing Infrastructure

PVPC's regional planning strongly emphasizes reuse and improvement of infrastructure. The Regional Brownfields Plan outlined policies and model projects for retrofitting existing urban infrastructure to operate more sustainably. Brownfields redevelopment is very much aligned with policies encouraged in the infrastructure plan: redevelopment of urban or town-center sites like those found in the ABIs can mitigate the need to extend new water, sewer and other services to undeveloped greenfield areas, saving public money and slowing the inappropriate development of farmland and forests. All 20 ABIs are located within the community's developed core and are served by existing infrastructure (water, sewer, electric and telecom). Access to infrastructure will be a site selection criterion. In Springfield, redevelopment of 135-155 Lyman Street will build on existing infrastructure, including the buildings currently in place. There are currently businesses within the Millyard that use available infrastructure. Further redevelopment of the Millyard will also directly use the current infrastructure.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2a. Community Need

2ai. The Community's Need for Funding

The burden of brownfields is borne largely by the residents of the 20 ABIs. Residents tend disproportionately to be poor and/or unemployed and are overrepresented among those who are most vulnerable to contaminant exposure for linguistic, socioeconomic, or biological reasons (children, women of child-bearing age). Poverty is an acute problem in census tracts containing the ABIs, at more than double the state rate and 72% higher than the US rate. Overall, almost 16% of ABI households survive on \$10,000 or less per year, with the rate reaching as high as 34.3% in the Downtown Springfield ABI [2010 5-year ACS; Regional Brownfields Report].

2aii. Threat to Sensitive Populations

The 20 ABIs identified in the Regional Brownfields Plan are disproportionately impacted by the presence of brownfields and other contaminated sites. ABIs include almost half of all current and historic industrial land in the region, despite occupying only 8.3% of the total land area. With some variation among the individual neighborhoods, the ABIs tend to include a high proportion of minorities and Hispanics and a high share of at-risk groups, including children and women of child-bearing age. 19 of the 20 ABIs contain state-designated environmental justice areas.

Disproportionate proximity to brownfields leads to disproportionate health and welfare impacts. Public health indicators show associations between disease and brownfields-related environmental factors such as lead paint, soil contaminants and air pollution, which are all concentrated disproportionately in older industrial neighborhoods like the ABIs. Aging housing stock presents an additional environmental hazard. About 55% of housing units in the Valley were built prior to 1960, before lead paint was phased out for residential use. This measure exceeds 90% in former mill worker neighborhoods. In many ABIs, the prevalence of abandoned brownfields keeps property values low and deters investments, such as lead paint abatement, by landlords and other property owners, exposing vulnerable residents (especially young children and pregnant women) to potential lead poisoning. [2017 5-year ACS]. With less than 9.5% of the state's population, the Valley contains 15.1% of the state's cases of childhood lead poisoning, mostly in Springfield. In municipalities containing ABIs, total cancer rates are nearly 13% above the state rate, with Hispanic ABI residents suffering almost 58% more cancers than their statewide counterparts. In Hampden County, which contains three-quarters of the Valley's population and all of its large-scale air pollution emitters, emergency hospitalizations for asthma are 85% higher than the state rate, again with especially high rates for Hispanics (97% higher than the state rate), who are three times likelier to need hospitalization than non-Hispanic whites. [Massachusetts Dept. of Public Health]

2b. Community Engagement

2bi. Project Partners

As a regional entity, PVPC has strong partnerships at both the federal and state and in our 43 member municipalities. EPA's funds and project officer are great partners, providing essential resources and technical guidance. MassDevelopment, operator of the state brownfields redevelopment fund, is a key collaborator. Aside from sometimes funding projects in tandem with our EPA resources, they have strong contacts in the economic development community who can help identify brownfields that may be viable for private sector redevelopment. Both US HUD and the Mass. Dept. of Housing and Community Development have been key partners by providing CDBG grant funds for post-cleanup redevelopment; PVPC has strong long-term relationships with both. Local municipalities are our most frequent collaborators, providing local

knowledge, community contacts, and vast experience with redevelopment projects. In the past, officials from Springfield, Holyoke, Chicopee, and Ware have served on PVPC's brownfields advisory committee. We continue to reach out to other brownfields-impacted cities and towns to participate. Examples of local (non-municipal) partners include: the Economic Development Council of Western Massachusetts, Public Health Institute of Western Massachusetts, and the Connecticut River Conservancy (see 2bii for details).

The Massachusetts Department of Environmental Protection (MassDEP) regulates the state's MGL Chapter 21e voluntary cleanup program. Under 21e's privatized system, QEPs registered as Licensed Site Professionals (LSPs) conduct assessment and cleanup work under state regulations. Their work is periodically audited by MassDEP staff. PVPC has collaborated with and will continue to work with MassDEP to determine petroleum site eligibility and to make sure brownfield landowners (often towns or cities) understand the regulatory process and any liability issues. When reportable contamination is found, sites are registered in the 21e program. PVPC works very closely with MassDEP's brownfields team, two of whom serve on our Brownfields Advisory Committee, and we will continue to do so under a FY20 grant. In Massachusetts, most public health functions are in the domain of town boards or city departments. PVPC staffs the Hampden County Health Coalition, which is responsible for coordinating responses to public health and natural emergencies in most of the Valley. Relationships established through the Coalition and other projects have proved essential in the past.

2bii. Project Partner Roles

As a regional entity, PVPC partners with several key state, regional and local organizations. We expect that outreach and momentum during the grant period will lead to further partnerships. Letters of commitment from the organizations listed below are attached to this proposal.

Organization	Organizational Mission	Commitment of Services
EDC of Western Massachusetts	Dedicated to encouraging economic development in the Pioneer Valley by providing resources and information to businesses operating in, or entering, the region to aid in expansion, relocation and networking.	BAC Member
Public Health Institute of Western Massachusetts	Committed to improving public health by fostering innovation, leveraging resources, and building partnerships across sectors, including government, community groups, the healthcare system, media, and academia.	BAC member
CT River Conservancy	Collaborates with partners across four states to protect and advocate for your rivers and educate and engage communities. They bring people together to prevent pollution, improve habitat, and promote enjoyment of your river and its tributary streams.	BAC member

2biii. Incorporating Community Input

Community engagement starts with PVPC's Brownfields Advisory Committee (BAC). The BAC was established in prior rounds of Brownfields funding, and will be revitalized if FY20 funding

is received. The BAC will be composed of officials from key brownfields-impacted cities and towns, state environmental and economic development staff, bankers, and representatives from environmental, public health and economic development community organizations. The BAC will meet quarterly. It will serve the key functions of establishing site selection procedures, reviewing all requests for assessment assistance, and aiding in community outreach.

In coordination with the BAC, PVPC will issue a press release notifying the region of the launch of our program. Information will be issued through our website, municipal and brownfields email blast lists, social media and BAC partners' contact lists. We will request an article in the *Springfield Republican* and other media outlets. In order to engage with ABI neighborhoods effectively, a contractor will translate the media release and basic program information to Spanish, the major foreign language in almost all the ABIs, for parallel distribution. Materials will be updated and re-distributed periodically throughout the grant period.

Early in the grant period, PVPC and its partners will hold 2 regional public forums in ABI neighborhoods during the work day and the evening to maximize public access. Meetings will be held in transit- and ADA-accessible locations and will include childcare if possible. We will summarize our assessment program and its nomination process, other brownfields resources, and discuss potential sites. PVPC will work with municipal staff, elected officials, and partner community organizations to publicize the meetings to residents and other key groups, and media placements will be sought. Live translation will be obtained for any meeting held in an area with substantial foreign language speakers (such as Holyoke or Springfield ABIs) or if suggested via forum pre-registrants or by partner organizations. Where requested, we will also attend public or staff-level meetings with potential program applicants to help communities understand the nomination process, site eligibility, and liability concerns.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS 3a. Description of Tasks/Activities and Outputs

Task 1: Cooperative Agreement Oversight

<u>3ai. Project Implementation:</u> Oversee the assessment program, including procurement and management of contractors (with Davis- Bacon compliance and S.106 historic review, where required), reporting quarterly to EPA (including MBE-WBE), updates of ACRES, and monitoring of costs under CERCLA 104(k) to ensure that activities are eligible for funding. Staff effort for <u>all tasks</u> is expected to be distributed 2/3 to hazardous substances oversight and 1/3 to petroleum.

3aii. Anticipated Project Schedule: 36 months (duration of the grant)

<u>3aiii. Task/Activity Lead:</u> PVPC brownfields team; QEP for technical elements of quarterly reporting and ACRES

<u>3aiv. Outputs:</u> Procure QEP, 12 Quarterly reports, continuous updates to ACRES to track program measures, annual MBE/WBE reporting per grant, eligibility determinations, executed access agreements and attendance for 2 PVPC staff to the National Brownfields Conference.

Task 2: Community Outreach and Engagement

<u>3ai. Project Implementation:</u> Provide community outreach and engagement, and focus on site selection. Outreach and engagement will occur through regional coordination, partnership development, media publicity and two regional forums. Establish or enhance community-based partnerships, conduct staff or public outreach meetings with potential applicants (where requested), update and distribute program information, and encourage media placement. Attend

BAC, regional and site-specific public meetings as part of the outreach process. Site-specific meetings will be held when requested by the project proponent or if imminent health threats are found. Consult EPA/MassDEP on project eligibility and will provide an assessment scope and cost estimate for the BFAC's use in scoring nominations. Convene BAC meetings and discuss formal selection of sites; as needed, work with landowners on access issues.

3aii. Anticipated Project Schedule: First 6-18 months

3aiii. Task/Activity Lead: PVPC, Brownfields Advisory Committee (BAC), QEP

3aiv. <u>Outputs</u>: Engage the community in the site selection and assessment process, conduct 9 public meetings, meeting minutes, presentation materials, Brownfields inventory database development, City website and social media updates, GIS site maps, flyers, handouts, brochures, email blasts.

Task 3: Cooperative Agreement Oversight

<u>3ai. Project Implementation:</u> following site selection, kickoff meetings or conference calls will be held for each project, assessment field work, laboratory analysis, reports and state VCP submittals by the QEPs (reviewed by PVPC and the project proponent). Staff work will include oversight of contractors, review of contractor submittals, and status updates to the host community (public meetings will be held under Task 2, as will any needed translation of assessment results). Coordination with EPA will be required during QAPP development, and MassDEP will be asked to comment on any submittals at complex or sensitive sites. Phase Is will comply with ASTM's E-1527-13 AAI standard. Phase IIs including soil, indoor air, groundwater and any hazardous building materials sampling will conform to applicable Massachusetts and EPA regulations.

3aii. Anticipated Project Schedule: First 6-24 months

3aiii. Task/Activity Lead: QEP, PVPC

<u>3aiv. Outputs:</u> 9 Phase I and 6 Phase II reports. Enroll sites into the MassDEP's voluntary cleanup program (MCP), if applicable.

Task 4: Cooperative Agreement Oversight

<u>3ai. Project Implementation:</u> a reuse and cleanup planning process will be conducted. May be a visioning plan that seeks to build community consensus on site reuse options based on assessment results. In others instances they will align more with EPA's ABCA process, providing a summary of remedial costs, benefits and timelines.

3aii. Anticipated Project Schedule: final 18-36 months

3aiii. Task/Activity Lead: QEP, PVPC

3aiv. Outputs: Outputs: 3 Reuse and Cleanup Plans / ABCAs (3 hazardous and 1 petroleum).

3b. Cost Estimates

A total of \$300,000 in Hazardous (\$225K), and Petroleum (\$75K) grant awards will be designated for the completion of a total of 9 Phase Is, 6 Phase IIs, and 3 Cleanup & Reuse Plans (ABCAs). The PVPC will use a portion of the \$300,000 grant award for costs related to personnel, fringe, travel, supplies, and contractual are calculated by grant and scope of works provided in the past (as indicated in section 3.a.).

Task 1: Personnel costs will total \$10,150 plus \$4,090 for eligible fringe at 41.8% of direct. Personnel costs for the Senior Planner/Manager (program lead) are budgeted at \$8,150 (6+ hours/month x 36 months = 216 hours at \$35/hour) and for the Principal Planner/Manager are \$2,000 (1+ hour/month x 36 months = 36 hours at \$44/hour). Financial oversight (drawdowns,

invoice processing) will be handled by our financials team in-kind at no cost to the grant. Travel costs are included at \$5,000. This includes the cost for two staffers to attend two brownfields conferences during the grant (est. \$2,000 total) plus mileage within our 43-town region for oversight of all tasks and travel to brownfields training events within the state (~1,650 miles at \$.58/mile = \$1,000). QEP support under this task (\$2,500) will be provided for some technical elements of quarterly reporting and ACRES. Supplies (\$1,250) will include materials and technology for public meetings (graphics, handouts, audience response gadgets/app, etc...).

Task 2: Personnel costs are for the Senior Planner, budgeted at \$3,250 (2+ hours/month x 36 months = 72 hours at \$35/hour) plus \$1,420 fringe. QEP support as described here totals \$8,000.

Task 3: Personnel costs for Senior Planner are budgeted at \$2,250 (1+ hours/month x 36 months = 72 hours at \$35/hour) and for the Principal Planner at \$1,000 (<1 hour/month x 36 months = 24 hours at \$41/hour). Total fringe is \$1,420. Our QEPs will complete roughly 9 Phase I and 6 Phase II assessments. In each case, 2/3 of the work will be for hazardous substances and 1/3 for petroleum sites. Based on past assessment programs and recent discussions with state agencies and QEPs, we expect that Phase Is will average \$4,000. Phase II costs are more variable but anticipated at an average of \$34,000 per. Our program is focused primarily on Phase II assessments, with \$204,000 in contractual costs slated for them compared to \$36,000 for Phase Is. Community outreach related to assessments, including any translation, will be conducted under Task 2.

Task 4: Personnel costs are for the Senior Planner, budgeted at \$3,250 (2+ hours/month x 36 months = 72 hours at \$35/hour) plus \$1,420 fringe. Anticipate QEPs will complete 3 reuse/cleanup plans at \$5,000 each.

BUDGET TABLE		Task 1:	Task 2:	Task 3:	Task 4:	
Cost Category	Contaminant Type	Cooperative Agreement oversight	Site selection & outreach	Site assessments	Reuse & clean-up planning	SUB- TOTALS
Personnel	HazSubs	\$8,000	\$2,500	\$2,500	\$2,500	\$15,500
	Petroleum	\$2,150	\$750	\$750	\$750	\$4,400
Fringe	HazSubs	\$3,150	\$1,000	\$1,000	\$1,000	\$6,150
-41.80%	Petroleum	\$940	\$420	\$420	\$420	\$2,200
Travel	HazSubs	\$4,000	\$0	\$0	\$0	\$4,000
	Petroleum	\$1,000	\$0	\$0	\$0	\$1,000
Supplies	HazSubs	\$1,000	\$0	\$0	\$0	\$1,000
	Petroleum	\$250	\$0	\$0	\$0	\$250
Contractual	HazSubs	\$2,000	\$6,000	\$180,000	\$10,000	\$198,000
	Petroleum	\$500	\$2,000	\$60,000	\$5,000	\$67,500
SUBTOTALS	HazSubs	\$18,150	\$9,500	\$183,500	\$13,500	\$224,650
	Petroleum	\$4,840	\$3,170	\$61,170	\$6,170	\$75,350
TOTAL		\$22,990	\$12,670	\$244,670	\$19,670	\$300,000

Note: no equipment costs are requested; budget includes only grant-eligible direct costs

3c. Measuring Environmental Results

Quarterly reporting, ACRES and regularly scheduled BAC meetings will be utilized to track, measure and monitor progress and project schedules, evaluate program output and outcome achievement and to ensure that grant funds are expended in a timely and efficient manner. This process has been followed during past grants and has been both successful and effective. If a project is not on schedule, the reasons will be documented in the quarterly report along and a corrective action plan to get the project back on track will be implemented.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4a. Programmatic Capability

4ai. Organizational Structure

PVPC has over 15 years of experience with EPA's brownfields program and two capable staff leads, providing significant redundancy in program management. An Audit and Management Letter for the period ending June 30, 2010 was received regarding documentation of staff time charges for PVPC's brownfields RLF by PVPC's former accountant. An updated internal controls policy was developed with approval from EPA Region 1's OIG (determination letter dated 11/3/2011), under which PVPC accounting and program staff implemented changes to the internal accounting system to better reflect current program requirements and to establish a central financial record for the program. The record is reviewed regularly by the Deputy Director for Operations. The FY20 Regional Brownfields Program will be managed within the Community Development Department, which has an excellent record in managing grants (Brownfields, CDBG, etc.) The PVPC is ready to implement assessment grants and, if awarded, will seek approval to begin community outreach prior to Cooperative Agreement approval. Having managed previous grants, the PVPC has a proven track record with successful outreach.

4aii. Description of Key Staff

Ted Harvey, Senior Planner/Manager, will be the primary contact for this program, with responsibility for cooperative agreement oversight, reporting, and oversight of most of the assessment projects. Ted has ten years' experience in program and grant management, including management of 10 HUD-funded small-cities CDBG grants totaling more than \$4 million. Christopher Dunphy, Principal Planner/Manager, has worked at PVPC for over 20 years, during which time he has managed more than 30 HUD-funded small-cities CDBG grants totaling more than \$25,000,000. Chris managed PVPC's FY06 and FY14 assessment grants and was directly involved in the FY12 assessment grant. Chris will again be responsible for managing individual site assessments under the proposed grant. Both Ted and Chris are Massachusetts Certified Public Purchasing Officials and will guide the QEP procurement process. The brownfields team is supported by other PVPC staff. Lisa Edinger, Accounting Director, has worked at PVPC for eight years. She was responsible for drawdowns and payment of contractors under past AWP, assessment and RLF grants and is experienced with EPA's ASAP system. Patty Gambarini, Principal Environmental Planner, will provide assistance with brownfields-related wetlands and drainage issues and is proficient in Spanish; she will provide translation of short non-technical documents for sites in areas with sizeable Hispanic populations, as needed.

4aiii. Acquiring Additional Resources

Upon award of the grant and completion of startup requirements, PVPC's brownfields team will initiate a Request for Qualifications (RFQ) process to competitively select at least two Qualified Environmental Professional (QEP) firms, in our case MassDEP-approved Licensed Site

Professionals (LSPs). This will ensure that concurrent assessments can be completed rapidly and costs can be controlled. Selected BAC members will assist with proposal review and interviews to ensure that a broad spectrum of regional interests is represented in the procurement process. A contract translator will be hired for other languages, to translate technical documents, and to provide live translation at public meetings, upon request of the project proponent or based on demonstrated need.

4b. Past Performance and Accomplishments

4bi1. Accomplishments

PVPC has managed EPA brownfields grants since 1998. Past accomplishments include:

- Phase I and Phase II assessments were completed on the Pleasant Street Corridor in Northampton, MA. A \$12 million mixed-use, mixed-income housing development has since been constructed in the area. This is in addition to Complete Streets construction that was started in 2017 and included \$2.9 million in state funding.
- Phase I ESA was completed at 200-206 Walnut Street in Springfield, MA. Following that assessment, Gardening the Community (a local nonprofit that had recently acquired the property for use as an urban farm, farm stand, and outreach center), received an urban agriculture grant for \$39,900 to begin redevelopment.
- Phase I ESA completed in Ware at a former manufactured gas plant.
- An RLF loan of \$200,000 (20% discounted under the old RLF rules) made to the Town of Ware in 2006 funded remediation of an old dump at the former Ware Farm Equipment site. In late 2012, the site was redeveloped as a \$7 million public safety complex using local, state and federal funds.

4bi2. Compliance with Grant Requirements

The PVPC has over 15 years of experience successfully managing EPA brownfields grants of three types. Our FY12 grant was closed in 2016, with all reporting requirements (ACRES, quarterlies, MBE/WBE, etc.) completed. **ACRES updates** have been made since closure to include leveraging toward cleanup and redevelopment. Assessments were completed in accordance with all applicable state and federal regulations.

Threshold Criteria Response

1. Applicant Eligibility

The Pioneer Valley Planning Commission, as regional governmental agency, is eligible to apply for funding. Please see attached eligibility statement.

2. Community Involvement

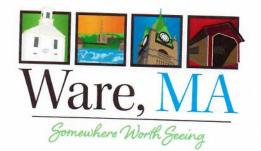
Community engagement starts with PVPC's Brownfields Advisory Committee (BAC). The BAC will be composed of officials from key brownfields-impacted cities and towns, state environmental and economic development staff, bankers, and representatives from environmental, public health and economic development community organizations. The BAC will meet quarterly. It will serve the key functions of establishing site selection procedures, reviewing all requests for assessment assistance, and aiding in community outreach.

In coordination with the BAC, PVPC will issue a press release notifying the region of the launch of our program. Information will be issued through our website, municipal and brownfields email blast lists, social media and BAC partners' contact lists. We will request an article in the *Springfield Republican* and other media outlets. In order to engage with ABI neighborhoods effectively, a contractor will translate the media release and basic program information to Spanish, the major foreign language in almost all the ABIs, for parallel distribution. Materials will be updated and re-distributed periodically throughout the grant period.

Early in the grant period, PVPC and its partners will hold 2 regional public forums in ABI neighborhoods during the work day and the evening to maximize public access. Meetings will be held in transit- and ADA-accessible locations and will include childcare if possible. We will summarize our assessment program and its nomination process, other brownfields resources, and discuss potential sites. PVPC will work with municipal staff, elected officials, and partner community organizations to publicize the meetings to residents and other key groups, and media placements will be sought. Live translation will be obtained for any meeting held in an area with substantial foreign language speakers (such as Holyoke or Springfield ABIs) or if suggested via forum pre-registrants or by partner organizations. Where requested, we will also attend public or staff-level meetings with potential program applicants to help communities understand the nomination process, site eligibility, and liability concerns.

3. Expenditure of Assessment Grant Funds

The Pioneer Valley Planning Commission does not have an active EPA Brownfields Assessment Grant



TOWN OF WARE

Planning & Community Development 126 Main Street, Ware, Massachusetts 01082 t. 413.967.9648 ext. 118 f. 413.967.9642 rdecourcey@townofware.com

November 25, 2019

Kimberly H. Robinson, Executive Director Pioneer Valley Planning Commission 60 Congress Street Springfield, MA 01104-4319

Subject: Brownfields Assessment Grant Application

Dear Ms. Robinson,

The Town of Ware is happy to support the Pioneer Valley Planning Commission's application to EPA for brownfields assessment funding for the Pioneer Valley area, including Ware.

Ware was historically the manufacturing hub of eastern Hampshire County, and today has several historic mills and other commercial/industrial properties that are potentially brownfields. Downtown Ware was has been recognized as an 'Area of Brownfields Interest' in PVPC's regional brownfield plan. The Town has successfully worked with PVPC on two recent brownfield projects, including an RLF cleanup site that was recently redeveloped as a multi-million dollar public safety complex.

In 2009, PVPC utilized EPA funding to conduct a Phase I site assessment of a former gas plant property near downtown Ware. This property is immediately adjacent to Memorial Field, one of the community's most active ballparks (baseball and soccer). Although the Massachusetts Department of Environmental Protection has indicated that the property is not an imminent hazard to the park's users, limited sampling revealed the need for Phase II assessment on and down gradient from the former plant site. Accessing funds from an FY14 Regional Brownfields Assessment Grant, the Town of Ware completed a modified Phase II assessment. Recreational improvements to Memorial Field were completed under a Community Development Block Grant (\$535,000 for this project) through the state Department of Housing and Community Development.

The Town is currently focused on continuing redevelopment of its Millyard, located in the downtown area and the site of at least one known brownfields (at 16 E. Main Street). The Town is conducting a planning study on redevelopment and reuse of the Millyard. Depending on the findings of this study and Brownfields assessment funds, Community Development Block Grant funds will be sought to focus on redevelopment of the Millyard. Under the CDBG program, Ware has access to roughly \$50,000 in uncommitted program income funds that can be used should site assessment (or cleanup) be required beyond the availability of any grant funds from EPA and PVPC, the Town of Ware at any point can use this funding to supplement EPA-funded environmental work.

The Town of Ware looks forward to continued collaboration with the PVPC and its Brownfields Advisory Committee. If EPA assessment grant funding is utilized in Ware, the Town will assist with public outreach and will seek other funding to help leverage EPA and PVPC's investment.

If you have any questions or need more information, please do not hesitate to contact me.

Sincerely,

Reliexah DeCarum Rebekah DeCourcey

Director of Planning and Community Development



November 19, 2019

Kimberly H. Robinson, Executive Director Pioneer Valley Planning Commission 60 Congress Street Springfield, MA 01104-4319

Re: FY2020 Brownfields Assessment Grant

Dear Ms. Robinson,

The Public Health Institute of Western Massachusetts (PHIWM) is pleased to support the Pioneer Valley Planning Commission's (PVPC) application to the U.S. Environmental Protection Agency (EPA) for Brownfields Assessment funding for the Pioneer Valley region. The PHIWM is a not-for-profit organization with the mission of building measurably healthier communities with equitable opportunities and resources for all through civic leadership, collaborative partnerships and policy advocacy.

EPA grant funds will provide much needed financial assistance for environmental assessment at brownfields in the region, and support development of remediation strategies. EPA funding will support the region in identifying and resolving environmental issues directly impact the health of our region.

The PHIWM is willing to serve on the project Advisory Committee should this application be funded.

Sincerely,

Jessica Collins
Executive Director

Jessica of Callins



1350 Main Street

Suite 1110

Springfield, MA 01103

Main: 413-731-8848

Fax: 413-755-1349

November 22, 2019

Kimberly H. Robinson, Executive Director

Pioneer Valley Planning Commission

60 Congress Street

Springfield, MA 01104-4319

massdevelopment.com

Re: FY2020 Brownfields Assessment Grant

Dear Ms. Robinson

As MassDevelopment's Western Massachusetts administrator of the Massachusetts Brownfields Redevelopment Fund, I am pleased to offer this letter of support for the application of the Pioneer Valley Planning Commission for an assessment-funding grant.

Created in 1998 by the legislature and managed by MassDevelopment, the Massachusetts Brownfields Redevelopment Fund ("the Fund") offers financing to municipalities, private developers, nonprofit organizations, and businesses to conduct environmental assessment of blighted properties to determine the extent of in-ground contamination and to develop a remediation plan if needed. The Fund also provides financing to remove or contain soil or ground water contamination. By providing pre-development financing, the Fund seeks to attract other public and private funding to support the productive re-use of brownfields.

MassDevelopment staff, located in regional offices across the state, work to promote awareness of the Fund by attending local business and community events and meeting individually with potential applicants. Many of the projects that MassDevelopment participates in are located at sites where EPA funding has already been provided through assessment grants or revolving loan funds administered by our regional planning agencies. The Fund helps to supplement these previously committed funds, and provides the ability for projects to continue to advance toward a permanent solution. In the Pioneer Valley alone we have supplemented EPA funding at the following locations: the former Uniroyal and Facemate sites in Chicopee; the Everett Street site in Easthampton; and the former Chapman Valve and the Phoenix Award winning Union Station in Springfield.

We look forward to continuing to work with all our regional partners, including the Pioneer Valley Planning Commission, in the redevelopment of brownfield sites throughout Massachusetts.

Sincerely,

Richard Griffin Jr.

Vice President, Community Development MassDevelopment – Western Regional Office



November 19, 2019

Kimberly H. Robinson, Executive Director Pioneer Valley Planning Commission 60 Congress Street Springfield, MA 01104-4319

Re: FY2020 Brownfields Assessment Grant

Dear Ms. Robinson

The Economic Development Council of Western Massachusetts (EDC) is pleased to support the Pioneer Valley Planning Commission's (PVPC) application to the U.S. Environmental Protection Agency (EPA) for Brownfields Assessment funding for the Pioneer Valley region. The EDC is a private not-for-profit organization focused on encouraging the economic development in the Pioneer Valley of Western Massachusetts. Through our network of affiliates and partners, the EDC leads the economic development agenda for the region.

EPA grant funds will provide much needed financial assistance for environmental assessment at brownfields in the region, and support development of remediation strategies. EPA funding will support the region in identifying and resolving environmental issues that prevent sound economic development. This effort is a crucial step in bringing underutilized land back into productive use to provide jobs and revenue to the local economy.

The EDC is willing to serve on the project Advisory Committee should this application be funded.

Sincerely,

Rick Sullivan, President & CEO

Western Mass EDC



15 Bank Row, Greenfield, MA 01301 413.772.2020 · www.ctriver.org

November 19, 2019

Kimberly H. Robinson, Executive Director Pioneer Valley Planning Commission 60 Congress Street Springfield, MA 01104-4319

Re: FY2020 Brownfields Assessment Grant

Dear Ms. Robinson,

On behalf of the Connecticut River Conservancy (CRC), we are pleased to confirm our support for and commitment to the Pioneer Valley Planning Commission's (PVPC's) application to the United States Environmental Protection Agency for brownfields assessment funding for our region. CRC is the principal nonprofit environmental advocate for protection, restoration, and sustainable use of the Connecticut River and its tributaries.

If funded, the grant will provide financial assistance for assessment work at brownfields in older industrial neighborhoods along the Connecticut River and its tributaries. These properties have become distressed and underutilized because of actual or perceived environmental contamination. With funding from this grant, PVPC will be able to assess environmental conditions at sites, leading to the eventual remediation of problem properties. The eventual cleanups will serve to remove sources of contamination to our rivers. We have come a long way from the days that the Connecticut River was considered the "best landscaped sewer" in the country. Assessing brownfield sites along the river is a crucial step in bringing properties back into beneficial reuse and revitalizing our region's riverfronts.

Our organization looks forward to working cooperatively with PVPC, local communities, and other community organizations to help make the project a success. CRC is available to work with PVPC and site owners on river related issues to advance assessment, cleanup and protection of our rivers.

I can be reached at adonlon@ctriver.org or (413) 772-2020 x.205.

Sincerely,

Andrea F. Donlon River Steward

OMB Number: 4040-0004 Expiration Date: 12/31/2019

Application for F	Federal Assista	nce SF	-424							
* 1. Type of Submissi Preapplication Application Changed/Corre	on: ected Application	⊠ Ne	6M [evision, select approper (Specify):	priate letter(s):			
* 3. Date Received: 12/03/2019		4. Appli	cant Identifier:							
5a. Federal Entity Ide	ntifier:			5b	. Federal Award Ide	entifier:				
State Use Only:				•						
6. Date Received by \$	State:		7. State Application	Identi	ifier:					
8. APPLICANT INFO	RMATION:									
* a. Legal Name: Pi	ioneer Valley	Planni	ng Commission							
* b. Employer/Taxpay	er Identification Nur	mber (EIN	I/TIN):	1	: Organizational DU	JNS:				
d. Address:				1						
* Street1: Street2:	60 Congress S	treet]
* City:	Springfield									_
County/Parish:										
* State:					MA: Massachus	setts				
Province:										
* Country:					USA: UNITED S	STATES				
* Zip / Postal Code:	01104-3419									
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Department Name:				Div	vision Name:				٦	
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f. Name and contac	t information of p	erson to	be contacted on ma	atters	s involving this ap	pplication:				
Prefix:			* First Name):	Christopher					
Middle Name: J.										
* Last Name: Dun	phy									
Suffix:										
Title:										
Organizational Affiliat	ion:									
* Telephone Number:	4137816045				Fax Numb	per:				
* Email: cdunphy@	pvpc.org									

Application for Federal Assistance SF-424
* 9. Type of Applicant 1: Select Applicant Type:
E: Regional Organization
Type of Applicant 2: Select Applicant Type:
Type of Applicant 3: Select Applicant Type:
* Other (specify):
* 10. Name of Federal Agency:
Environmental Protection Agency
11. Catalog of Federal Domestic Assistance Number:
66.818
CFDA Title:
Brownfields Assessment and Cleanup Cooperative Agreements
* 12. Funding Opportunity Number:
EPA-OLEM-OBLR-19-05
* Title:
FY20 GUIDELINES FOR BROWNFIELD ASSESSMENT GRANTS
13. Competition Identification Number:
Title:
14. Areas Affected by Project (Cities, Counties, States, etc.):
Add Attachment Delete Attachment View Attachment
* 15. Descriptive Title of Applicant's Project:
The PVPC is seeking \$300,000 of EPA Brownfield assistance for the purpose of conducting Phase 1
and Phase II site assessments to potentially contaminated properties through the Pioneer Valley region.
Attach supporting documents as specified in agency instructions.
Add Attachments

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant MA-001 * b. Program/Project MA-001	
Attach an additional list of Program/Project Congressional Districts if needed.	
Add Attachment Delete Attachment View Attachment	
17. Proposed Project:	
* a. Start Date: 04/01/2020	
18. Estimated Funding (\$):	
* a. Federal 300,000.00	
* b. Applicant 0 . 00	
* c. State 0 . 00	
* d. Local 0 . 0 0	
* e. Other 0 . 0 0	
* f. Program Income 0.00	
* g. TOTAL 300,000.00	
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?	
a. This application was made available to the State under the Executive Order 12372 Process for review on	
b. Program is subject to E.O. 12372 but has not been selected by the State for review.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.) Yes No	
☐ Yes No	
☐ Yes ☑ No If "Yes", provide explanation and attach	
If "Yes", provide explanation and attach Add Attachment Delete Attachment View Attachment 21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001) *** I AGREE ** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency	
If "Yes", provide explanation and attach Add Attachment Delete Attachment View Attachment 21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001) ** I AGREE ** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.	
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